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HUNTON & WILLIAMS LLP  
RIVERFRONT PLAZA, EAST TOWER  
951 EAST BYRD STREET  
RICHMOND, VIRGINIA 23217-4074

TEL 804 • 788 • 8700  
FAX 804 • 788 • 8218

DAN J. JORDANGER  
DIRECT DIAL: 804-788-8609  
EMAIL: djordanger@hunton.com

FILE NO: 30067-000009

May 10, 2006

**VIA ELECTRONIC AND  
OVERNIGHT MAIL**

Mr. Randy Sturgeon (3HS23)  
United States Environmental  
Protection Agency, Region III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**Re: Response of The Peck Company to Request for Information Pursuant  
Under Section 104(e) of CERCLA With Regard to Peck Iron and Metal  
Property, 3850 Elm Avenue, Portsmouth, Virginia**

Dear Mr. Sturgeon:

On behalf of The Peck Company (hereinafter "Peck"), this is the response, as of the date set forth above, to the letter from Dennis P. Carney dated January 13, 2006, and received by Peck on March 6, 2006, requesting information with regard to the Peck Iron and Metal property in Portsmouth, Virginia (hereinafter the "Information Request").<sup>1</sup> We are submitting this response in our capacity as counsel for Peck. Peck understands that it has a continuing obligation to supplement this response if additional information becomes available, and Peck reserves the right to submit additional information that it may find to be responsive to the Information Request.

Set forth below are each question contained in the Information Request in ***bold-faced, italicized type***, followed by Peck's response as of the date of this letter.

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<sup>1</sup> The Information Request called for a response within 30 calendar days of the date on which we received it. In a letter to Dennis Carney sent on March 17, 2006, David Peck requested an extension until May 5, 2006, to submit Peck's response. On behalf of EPA, Mr. Carney granted this request in a letter sent to Mr. Peck on March 28, 2006. Patricia Miller granted Peck an additional extension until May 10, 2006, which I confirmed in an e-mail to Ms. Miller on May 3, 2006.

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1. *As it relates to the Site, what is the current nature of your business or activity or any other business or activity that may be taking place at the Site?*

RESPONSE:

Currently a minority owned business, Able Body Demolition, is using the property to store its trucks. Able Body also has unloaded inert material, including concrete, dirt, and asphalt, on the property, and has spread some of the piles of asphalt and concrete. The company has followed Peck's instructions not to remove any soil from the site, and to keep any visitors or vandals off the site.

2. *As it relates to the Site, what was the nature of any business or activity during the period of time you or any member of the Peck family, or a company substantially owned or controlled by the Peck family, either owned and/or operated the Site?*

RESPONSE:

From 1945 to approximately 1990, the business conducted at the property was the purchase, processing, storage and shipping of metal scrap from various military bases, other federal, state and local government agencies, and local businesses. Liquidation of remaining scrap materials off of the property continued into the early 1990s. In addition, Peck Equipment Company was established in the 1960's to locate hard-to-find parts for the U.S. Navy.

In a letter from S.G. Werner to D.S. Welch of EPA dated May 11, 2004, Mr. Werner provided an historical summary of Peck's activities at the property. This letter also was provided as an attachment to an e-mail from S.G. Werner to K. Bunker dated July 28, 2004.

3. *Describe how the size or property boundaries of the Site have changed since the inception of Peck activities at the Site.*

RESPONSE:

Some time during the period between 1945 and 1950, Peck acquired land adjacent to the original parcel. In the 1990's, less than an acre was acquired from the U.S. Navy. In 2003, Peck donated a conservation easement of approximately six acres along Paradise Creek to the Elizabeth River Project ("ERP"), which modified the land to serve as a wetland and forested buffer area. In the course of its work, the ERP removed a berm, dredged soils, re-contoured the area, and deposited soil back on other portions of the Peck property.



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The current 33 acres are on five parcels. The following table summarizes the title history of the current property.

#### Deed Records Search

DATE	GRANTOR	GRANTEE	COMMENTS
05-18-88	Peck Iron & Metal Co., Inc.	Elm Leasing Co.	2.990 ac - 1 <sup>st</sup> part 2 <sup>nd</sup> & 3 <sup>rd</sup> parts - Easements
10-01-76	USA Dept. of Navy	Peck Iron & Metal Co., Inc., et al.	3 <sup>rd</sup> part - Easement, 0.05 ac.
06-30-76	Norfolk- Portsmouth Belt Line Railroad Co.	Peck Iron & Metal Co., Inc., et al.	2 <sup>nd</sup> part - Easement agreement for use of Scott Center Road Crossing
10-28-69	USA Dept. of Navy	Norfolk-Portsmouth Belt Line Railroad Co.	Deed of Easement
12-30-63	Proctor & Gamble Mfg. Co.	Peck Iron & Metal Co., Inc.	4.544 ac.
05-13-88	Peck Iron & Metal Co., Inc.	Peck Portsmouth Land Co.	Parcel B - 22.924 ac.
12-30-63	Proctor & Gamble Mfg. Co.	Peck Iron & Metal Co., Inc.	4.544 ac.
01-26-60	Proctor & Gamble Mfg. Co.	Peck Iron & Metal Co., Inc.	21.4 ac.
01-26-60	Peck Iron & Metal Co., Inc.	Kenneth McCracken, Trustee	Holder of Note, 21.4 ac.
03-31-31	Portsmouth Cotton Oil Refining Corp.	Proctor & Gamble	Parcels A & B - 110 ac.
01-01-88	Julius S. & Bess P. Peck	JSP Land Company	2 ac; Parcel A-1.174 ac.; Parcel B- 2.733 ac.; 1st-0.8016 ac.; 2 <sup>nd</sup> -1 ac.; 3 <sup>rd</sup> - 0.55 ac.; 4 <sup>th</sup> -Parcel 1-0.004 ac., Parcel 2-0.17 ac.
07-29-47	Trites Refinery, Inc.	Julius S. Peck	2 ac.
07-12-47	Philip C. Cuddeback, et ux.	Trites Rendering, Inc.	



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03-08-47	Frederick W. Marrat	Philip C. Cuddeback	
01-07-29	American Forest Products Company	Frederick W. Marrat	
10-11-28	Cradock Mfg. Co.	American Forest Products Company	
09-29-50	Richard B. Kellam, Special Commissioner, et al.	Julius S. Peck & R.F. & Thirza Trant	Parcels A (1.174 ac.) & B (2.733 ac.). Kellam Commissioner for dispute in Trant family. R.F. paid off dispute amount to Commissioner, land released to Peck
07-30-28	H.W. West	John H. Trant, Jr.	
07-05-28	R.D. White	John H. Trant, Jr.	
05-28-28	Cradock Mfg. Co.	Richard B. Kellam, Special Commissioner	
08-06-45	Joseph W. Dunkam, et al.	Julius S. Peck (formerly Julius S. Pecker)	1 <sup>st</sup> - 2.304 ac. 2 <sup>nd</sup> - 1 ac. 3 <sup>rd</sup> - 0.55 ac. 4 <sup>th</sup> - Parcel 1 - 0.004 ac. Parcel 2 - 0.17 ac.
06-29-44	Commonwealth of Va.	Joseph W. Dunkum	4 <sup>th</sup> - Parcels 1 & 2; quit claimed to Dunkum
05-31-43	County of Norfolk	Commonwealth of Va.	4 <sup>th</sup> - Parcels 1 & 2; quit claimed to Commonwealth of Va.
08-03-28	Norfolk Portsmouth Bridge Corp.	County of Norfolk	4 <sup>th</sup> - Parcels 1 & 2
04-18-28	Cradock Mfg. Co.	Joseph W. Dunkum	3 <sup>rd</sup> - 0.55 ac.
04-16-27	Cradock Mfg. Co.	Joseph W. Dunkum	1 <sup>st</sup> - 2.304 ac.
04-27-26	Cradock Mfg. Co.	Joseph W. Dunkum	2 <sup>nd</sup> - 1 ac.



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4. *Explain how hazardous substances such as, but not limited to, polychlorinated biphenyls (PCBs) and lead came to be present on the site.*

RESPONSE:

The metal scrap purchased during the period of scrap metal operations consisted of damaged and obsolete equipment, attachments, parts, and other miscellaneous materials. At various times the scrap contained cadmium-coated automobile parts; lead as an additive in petroleum products; PCBs in insulated wire, gaskets, fluorescent lights, transformer oil, and household appliances that used capacitors; lead-based paint in scrapped bridge sections; and lead in automobile batteries. Metal scrap from the government was not cleaned or purged of hazardous substances before transfer to the Peck property.

5. *Provide all information regarding the current or past environmental and physical conditions at the Site including but not limited to geology and hydro-geology, soil, groundwater, surface-water (including drainage patterns), sediments, sewer systems, and storm water conveyance systems. This includes, but is not limited to, field observations and measurements, laboratory data, field screening data, boring logs, sample locations and dates.*

RESPONSE:

Physical and chemical data for the property have been submitted to the Virginia Department of Environmental Quality ("DEQ") and EPA. Peck believes that information provided to DEQ and EPA through December 2004 confirmed that there are discrete locations on the property with elevated concentrations of certain parameters, but that there would be no unacceptable risk to the environment or to humans if the property were covered with a cap and restricted as to future use. Furthermore, there were no indications that the property would endanger anyone if left undisturbed. A risk assessment prepared for Peck indicates that there would be no unacceptable risks to humans or the environment or the likelihood of a release to groundwater even if it were assumed that there are PCB concentrations of up to 5,000 mg/kg in the former metal processing area.

The following table lists reports and other communications by which EPA and/or DEQ were provided information responsive to this question. Peck is not submitting copies of these reports and communications with this response but will provide them to EPA upon request.

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Date	Recipient	Sender	Description
15-May-03	Bernard, J.	Werner, S.G.	Draft Site Characterization Risk Assessment Report
28-May-03	Bernard, J.	Werner, S.G.	Site Characterization - Risk Assessment Report, Proposed Pull-A-Part Site, 3500 and 3850 Elm Avenue, Portsmouth, Virginia
04-Aug-03	Bernard, J.	Werner, S.G.	Response to DEQ's 18-Jun-03 letter commenting on Site Characterization Report and proposing a sampling program
12-Aug-03			Quantitation Report of samples obtained on 8-Aug-03
11-Sep-03	Greene, K.L.	Peck, B.D.	Letter regarding EPA's desire to sample for dioxin contamination at site; briefly discussing previous site operations; and requesting authorization from DEQ to go forward with site remediation
21-Oct-03	Werner, S.G.	Unze, S.C.	Attaches sample results for PCDDs and PCDFs
04-Nov-03		Williams, M.D.	Pull-A-Part Sampling Event: 08-06-03
07-Nov-03	Bernard, J.	Werner, S.G.	Site Characterization Study Addendum; attached is 27-Oct-03 memorandum to J. Bernard from S.G. Werner presenting sediments sampling plan
21-Nov-03	Werner, S.G.	Kinder, D.S.	Explanation of deficiencies cited in M. Williams 4-Nov-03 report
18-Dec-03	Bernard, J.F.	Hatcher, R.F.	Email forwarding colloquy between J.F. Bernard and S. Hahn of NOAA regarding the Peck Property Report addendum
17-Feb-04	Werner, S.G.	Williams, M.D.	Memorandum regarding QA/AC criteria

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Date	Recipient	Sender	Description
17-Feb-04	Bernard, J.	Werner, S.G.	Response to EPA's 15-Jan-04 "Characterization Report Review"; attached are: EPA's 15-Jan-04 letter; QA/QC reports for PCB and lead analyses for soil samples; summary of data validation performed by Draper Aden; and a response by laboratory to deficiencies identified by Draper Aden
30-Mar-04	Rice, S.	Werner, S.G.	Letter enclosing PCB analytical data, including map showing October 2003 PCB soil sampling results
11-May-04	Welsh, D.S.	Werner, S.G.	Letter enclosing Peck's "Self-Implementing PCB Cleanup Plan"
28-Jun-04	Peck, D.B.	Jarvela, S.	Letter stating EPA wants to conduct sampling at Peck site's wetlands and shoreline along border of property and Paradise Creek. Property Access Agreement attached
29-Jun-04			EPA Region III "Property Access Form" granting EPA and members of response team access to The Peck Company Site to collect samples for PCB and metals analysis
07-Jul-04			Sediments chain of custody form prepared by Mr. Hatcher
13-Jul-04	Welsh, D.S.	Werner, S.G.	Response to EPA Region III's 22-Jun-04 letter to B.D. Peck from J.J. Burke regarding deficiencies in Self-Implementing PCB Cleanup Plan; attached is Revised (12-Jul-04) Site Characterization and Self-Implementing PCB Cleanup Plan



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Date	Recipient	Sender	Description
20-Jul-04		Severn Trent Labs	Sample confirmation report
16-Aug-04	Hatcher, R.F.	Jarvela, S.	Email regarding preliminary results of 7-Jul-04 sampling event
03-Sep-04	Hatcher, R.F.	Rieger, J.	Summary of samples taken; cost of analysis; map of locations where samples were taken
28-Sep-04	Loeb, M.	Werner, S.G.	Email update on sample analysis
26-Oct-04	Welsh, D.S.	Werner, S.G.	Response to EPA Region III's 15-Oct-04 correspondence regarding Self-Implementing PCB Cleanup Plan; attached is Revised (22-Oct-04) Site Characterization and Self-Implementing PCB Cleanup Plan
18-Nov-04	Hatcher, R.F., Werner, S.G.	List, R.	Email setting out treatability study results and suggesting a meeting to discuss the results, treatment/stabilization strategies, regulatory implications and costs.
23-Nov-04	Hatcher, R.F., Werner, S.G.	List, R.	Additional treatability results
06-Jan-05	Hatcher, R.F., Bernard, J.F., Green, K.L.	Rieger, J.	Email regarding 70 ppb PCB screening level in sediments
03-Feb-05	Hatcher, R.F.	Williams, T.G.	Fax proposing use of same grid numbers and letters system as drawing supplied to Koontz-Bryant, reporting of plant to conduct site work from 8-Feb-05 thru 10-Feb-05
09-Feb-05	Bernard, J.	Werner, S.G.	Memorandum regarding soil sample location plan
16-Jun-05	Werner, S.G. & Hatcher, R.F.	Webb, J.N.	Requesting status of grid sampling effort



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Date	Recipient	Sender	Description
Undated			Site location map; well locations and boring locations; summary of analytical data - surface soil samples (6/1999 & 7/1999); summary of analytical data - soil/water interface soil samples (7/1999); summary of analytical data - groundwater (7/1999); summary of analytical data - mixed media (7/1999)

Peck is submitting to EPA with this response the laboratory data reports for samples collected at the property during 2005.

6. *Provide all documents that show the types of material accepted, customers, operational periods, and description of operations (including locations of operations) both owned and/or operated by you or any tenant(s).*

**RESPONSE:**

Peck has no documents in its possession responsive to this question. The following provides a brief description of operations on the property based on David Peck's recollection.

The operations at the property until the 1980's were located in and around the cinderblock buildings in the center of the property. At one of the buildings, a hydraulic guillotine shear cut steel to size. One building served as a sorting and storage room for non-ferrous metals and contained a small aluminum furnace to melt aluminum scrap. In the front, by the stop light, was a men's locker room and machine shop. A weigh scale was outside an office trailer near the stop light.

During the period of scrap metal operations on the property, the Department of Defense processed and sold metal scrap to Peck Iron & Metal from various military bases and Navy yards, including: Norfolk Naval Shipyard; Naval Air Station; Oceana; St. Juliens Creek; Cheatham Annex; Yorktown; Quantico; Ft. Meade; and Bellwood. The General Services Administration, Coast Guard, NOAA, and other agencies of the federal government also regularly sold surplus material to Peck Iron & Metal. Other large, non-government sellers to Peck Iron & Metal included the railroads, Virginia Electric and Power, landfills (which were

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sources of white goods and miscellaneous scrap), and the ship repair facilities, including Newport News Shipbuilding and Drydock, Norfolk Shipbuilding, and Moon Engineering.

Two occupants of the property -- neither affiliated with Peck -- in approximately 2001-02 operated businesses involving the handling of equipment and perhaps scrap metals. One occupant 's operation led to action by DEQ, after which Peck evicted the occupant from the property. Currently, Able Body Demolition is using the property for truck storage and is helping to keep the property secure.

7. *Provide any correspondence to or from local, state or federal governments that discuss environmental conditions or issues at the property. This could include, but is not limited to, information regarding inspections, permits, violations and discharges.*

**RESPONSE:**

At the time Peck entered the Virginia Voluntary Remediation Program, its past and current environmental data were provided to DEQ. The history was also carefully reviewed by the Elizabeth River Project before it accepted approximately seven acres for a conservation easement.

The following table lists reports and other communications by which EPA and/or DEQ were provided information responsive to this question. Peck is not submitting copies of these reports and communications with this response but will provide them to EPA upon request.

Date	Recipient	Sender	Description
30-Apr-02	Gussman	Mayfield, M.	Letter informing DEQ of grant to address stormwater and habitat enhancement at Peck site
01-May-02	Peck, B.D.	Jackson, M.M.	Letter recommending demonstration project to enhance shoreline/stormwater on western side of Peck project, indicating that ERP expected \$30,000 to \$40,000 in grant funds to be available to assist in this voluntary project



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<b>Date</b>	<b>Recipient</b>	<b>Sender</b>	<b>Description</b>
06-Nov-02	Various	Jackson, L.	Email requesting comments on attached "Project Activities Coordination Meeting for 'Return to Paradise' - Peck Iron & Metal, Timeline of Action Items." List of attendees also attached.
27-Nov-02	West, T.	Pocota, M.A.	Letter regarding Joint Permit Applications (Peck and Elizabeth River Project) for wetlands restoration project and a stormwater/wetland pond
02-Dec-02		U.S. Army Corps of Engineers	Notification that Peck's proposed activity may qualify for Nationwide Permit 39; that proposed activity may affect historical properties (Norfolk Naval Shipyard); therefore, work cannot commence until requirements of National Historic Preservation Act have been met
06-Dec-02	Greene, K.L.	Cohen, A.	VRP Application for property located at 3850 Elm Avenue
13-Dec-02	Levetan, S.L.	Mayfield, M.	Letter offering grant-funded assistance to implement ERP's recommendations for sustainable development of Peck Site. Attached is "Environmental Stewardship Recommendations, Proposed Pull-a-Part Auto Recycling Facility, Elm Avenue, Portsmouth, VA" and "Best Management Practices for the Auto Salvage Industry"

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Date	Recipient	Sender	Description
06-Jan-03		VIMS	VIMS Shoreline Permit Application Report 02-2315 recommending applicant submit formal planting and monitoring plan
09-Jan-03			Notice of Public Hearing, Wetlands Board of the City of Portsmouth - Request of The Peck Company and The Elizabeth River Project for a wetland restoration area on the property at 3850 Elm Avenue
06-Mar-03			Portsmouth City Council, Public Hearing/Planning Items. Resolution (signed by City Manager) approving with conditions Pull-A-Part of Portsmouth's proposal to operate a motor vehicle recycling facility at 3850 Elm Avenue
11-Mar-03			Portsmouth City Council, Agenda. Pull-A-Part's use permit application is on agenda
14-Mar-03	Porter, S.J.	Wetmore, D.G.	Letter stating the exception request for BMP should not be granted because it does not meet necessary requirements
02-Apr-03	Pocta, M.A.	Porter, S.J.	Letter requesting additional WQIA information for site be submitted to Department by 11-Apr-03
10-Apr-03	Haste, G.J.	Pocta, M.A.	CBLAD and City of Portsmouth need stormwater calculations and justification for the stormwater location in the RPA buffer

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Date	Recipient	Sender	Description
11-Apr-03	Hatcher, R. F.	Hannah, J.	"Benefits of Proposed Stormwater Wetland at Peck Iron & Metal Site," Bill Hunt, Advisor to the Elizabeth River Project
14-Apr-03	Porter, S.J.	Hatcher, R.F.	Letter responding to 2-Apr-03 letter to M.A. Pocta in connection with locating a BMP within the Resource Protection Area for Paradise Creek wetlands
22-Apr-03	Porter, S.J.	Pocta, M.A.	Letter withdrawing Application for Exception from consideration at the City's Planning Commission meeting on 6-May-03
22-Apr-03	Hatcher, R.F.	Porter, S.J.	Memorandum stating information the City was seeking on stormwater calculations and buffer was not submitted timely and therefore will not be considered at the Planning Commission's 6-May-03 meeting
15-May-03	Bernard, J.	Werner, S.G.	DRAFT Site Characterization - Risk Assessment Report
28-May-03	Bernard, J.	Werner, S.G.	Site Characterization - Risk Assessment Report. Attached are: results of 29-Jul-99 Hatcher-Sayre Site Characterization Study; REAMS Risk Analysis; groundwater analytical results for 5-03 sampling; 9-Jul-99 Final Scope of Work for Site Investigation at The Peck Company, Portsmouth, Virginia
18-Jun-03	Hatcher, R. F.	Bernard, J.F.	Comments from DEQ and EPA on 28-May-03 Site Characterization Report and 4-June-03 site visit



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Date	Recipient	Sender	Description
18-Jun-03	Hatcher, R.F.	Bernard, J.F.	Letter commenting on 28-May-03 Site Characterization Report and 4-Jun-03 site visit
23-Jun-03	Hatcher, R.F.	Dinardo, Nicholas	Email requesting site visit with representatives of EPA, DEQ, and Peck.
14-Jul-03	Bernard, J.F.	Hatcher, R.F.	Letter regarding 9-Jul-03 meeting with DEQ and EPA, Peck's and Pull-A-Part's commitment to locate, remove and remediate "hot spots"
04-Aug-03	Bernard, J.	Werner, S.G.	Response to DEQ's 18-Jun-03 letter commenting on Site Characterization Report and proposing a sampling program
11-Sep-03	Greene, K.L.	Peck, B.D.	Letter regarding EPA's desire to sample for dioxin contamination at site; briefly discussing previous site operations; and requesting authorization from DEQ to go forward with site remediation
15-Sep-03	Comacho, J.	Werner, S.G.	Email inquiry regarding dioxins in soil -- capping as remediation
15-Sep-03	Cooper, D.	Werner, S.G.	Email listing questions regarding dioxin Werner would like to discuss with Cooper in a 1:30 telephone conversation
22-Sep-03	Rupert, R.	Jackson, M.M.	Memorandum setting out the Elizabeth River Project's position on disputed issues concerning contamination at the Peck site
25-Sep-03	Levetan, S.L.	Bernard, J.F.	Comments from DEQ and EPA on 4-Aug-03 Response to Comments and Proposed Sampling Plan

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Date	Recipient	Sender	Description
09-Oct-03			Agenda for 9-Oct-03 Elizabeth River Project meeting
07-Nov-03	Bernard, J.	Werner, S.G.	Site Characterization Study Addendum -- describes sampling activities between Jun- and Nov-03, analytical testing results and proposed approach to site remediation; attached is 27-Oct-03 memorandum to J. Bernard from S.G. Werner presenting sediments sampling plan
18-Dec-03	Bernard, J.F.	Hatcher, R.F.	Email forwarding colloquy between J.F. Bernard and S. Hahn of NOAA regarding the Peck Property Report addendum, stormwater runoff and the buffer
30-Dec-03	Hatcher, R. F.	Levetan, S.L.	Email forwarding language regarding "Peck 20031211 Review Ltr 1" providing EPA comments and observations of the 7-Nov-03 Peck Site Characterization Report
09-Jan-04	Hatcher, R.F.	Mayfield, M	Email entitled, "Elizabeth River Partnership - Jeopardy?" in which Mayfield forwards an exchange with Don Welsh, EPA Regional Administrator
15-Jan-04	Bernard, J.	Jarvela, S.	EPA's comments on Site Characterization Report
23-Jan-04	Bernard, J.F.	Greene, K.L., et al.	Email forwarding comments and observations on the 7-Nov-03 Peck Site Characterization Report

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Date	Recipient	Sender	Description
06-Feb-04	Bernard, J.F.	Hatcher, R.F.	Email forwarding Bernard's comments to K. Greene regarding EPA's comments and concerns: QA/QC documentation and the vertical investigation area
06-Feb-04	Peck, B.D.	West, T.L., MRC	Acknowledging receipt of application seeking authorization to create wetlands and clear phragmites
13-Feb-04	Bernard, J.F.	Jarvela, S., et al.	Series of emails whereby State requests contact from EPA for Perspective Purchaser Agreement issue; EPA requests point of contact for Pull-A-Part
17-Feb-04	Bernard, J.	Werner, S.G.	Response to EPA's 15-Jan-04 "Characterization Report Review"; attached are: EPA's 15-Jan-04 letter; QA/QC reports for PCB and lead analyses for soil samples; summary of data validation performed by Draper Aden and a response by laboratory to deficiencies identified by Draper Aden
27-Feb-04	Gills, W.	Werner, S.G.	Brownfield Remediation Loan Application submitted on behalf of The Peck Company
09-Mar-04	Jarvela, S.	Bernard, J.F.	Letter stating EPA is satisfied with Draper Aden site characterization and determined the project can proceed to the remediation stage
11-Mar-04	Bernard, J.	Jarvela, S.	Letter stating EPA's position that DEQ is the lead agency for Peck site project and is committed to support DEQ as the remedial action plan proceeds



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Date	Recipient	Sender	Description
12-Mar-04	Hatcher, R. F.	Bernard, J.F	Email colloquy at DEQ regarding Peck's Brownfield's loan application
26-Mar-04	Peck, B.D.	Gills, W.A.	Letter notifying Peck the SWCB approved Brownfield Remediation loan in the amount of \$960,000 contingent upon satisfactory credit analysis by the VRA.
16-Apr-04	Bunker, K.	Bernard, J.F.	Email regarding Bunker's assignment as EPA's project manager of the Peck site
22-Apr-04	Bernard, J.	Bunker, K.	Email requesting DEQ to instruct Peck to submit a self-implementing PCB cleanup plan that complies with 40 CFR 761.61(a)
07-May-04			One page synopsis of Peck Recycling Co.'s history
11-May-04	Welsh, D.S.	Werner, S.G.	Letter enclosing Peck's "Self-Implementing PCB Cleanup Plan"
18-May-04	Hatcher, R.F.	Jarvela, S.	Email stating Jarvela hasn't scheduled trip, but will send access form for owner to sign
15-Jun-04	Werner, S.G.	Bernard, J.F.	Email responding to S. Werner's interpretation of 40 CFR section 761.61 in connection with the Self-Implementing PCB Cleanup Plan. Email also discusses wetlands sampling
16-Jun-04	Baldwin, Bob	Jackson, L.	Email requesting a meeting with Baldwin and/or other City of Portsmouth representatives to discuss the City's concerns or needs in order to move forward with Elm Avenue remediation

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Date	Recipient	Sender	Description
22-Jun-04	Peck, B.D.	Burke, J.J.	EPA's comments on Peck's Notification and Certification, dated 11-May-04, provided pursuant to requirements of the Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste Regulation
27-Jun-04	Peck, B.D.	Jarvela, S.	Fax cover sheet attaching access agreement; Jarvela will contact Hatcher to schedule site visit
28-Jun-04	Peck, D.B.	Jarvela, S.	Letter stating EPA wants to conduct sampling at Peck site's wetlands and shoreline along border of property and Paradise Creek. Also attaches Property Access Agreement
29-Jun-04			DRAFT "Sampling and Analysis Plan for the Peck Iron and Metal Site, Portsmouth, Virginia" prepared for EPA by Tetra Tech
29-Jun-04			EPA Region III "Property Access Form" granting EPA and members of response team access to The Peck Company Site to collect samples for PCB and metals analysis
13-Jul-04	Welsh, D.S.	Werner, S.G.	Response to EPA Region III's 22-Jun-04 letter to B.D. Peck from J.J. Burke regarding deficiencies in Self-Implementing PCB Cleanup Plan; attached is Revised (12-Jul-04) Site Characterization and Self-Implementing PCB Cleanup Plan

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May 10, 2006  
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Date	Recipient	Sender	Description
28-Jul-04	Bunker, K.	Peck, B.D.	Memorandum regarding Peck's former operations at Portsmouth site.
28-Jul-04	Bunker, K.	Werner, S.G.	Email attaching a historical summary of Peck's activities at Elm Avenue which were included in 11-May-04 cover letter to Self-Implementing Cleanup Plan
28-Jul-04	List	Bunker, K., EPA	Email giving status on cleanup plan -- still reviewing amended plan EPA received on 14-Jul-04
16-Aug-04	Hatcher, R. F.	Bernard, J.F.	Email stating Levetan indicates Pull-A-Part is very determined to purchase property
20-Aug-04	Hatcher, R. F.	Bernard, J.F.	Email regarding status of Elm Avenue VRP project
23-Aug-04	Ward, K.	Bernard, J.F.	Email stating Elm Avenue project is moving forward
26-Oct-04	Welsh, D.S.	Werner, S.G.	Response to EPA Region III's 15-Oct-04 communication regarding Self-Implementing PCB Cleanup Plan; attached is Revised (22-Oct-04) Site Characterization and Self-Implementing PCB Cleanup Plan
16-Nov-04	Baldwin, R.A.	Barclay, R.C.	Letter Application for Extension of Use Permit 03-01 by Pull-a-Part of Portsmouth, LLC to operate a motor vehicle recycling facility at 3850 Elm Avenue, owned by The Peck Company, Peck-Portsmouth Recycling Co.
19-Nov-04	Peck, B.D.	Burke, J.J	EPA's response to Peck's Revised Notification and Certification, dated 25-Oct-04



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May 10, 2006  
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Date	Recipient	Sender	Description
01-Dec-04			Chronology of Primary Activities - Proposed Pull-A-Part, Inc. Site - Elm Avenue, Portsmouth, VA
22-Dec-04	Hatcher, R.F.	EPA, DEQ	Confirming 5-Jan-05 meeting to discuss options available under TSCA and/or CERCLA to move forward on remediation of the Peck site
05-Jan-05			Attendance list of meeting
05-Jan-05			Draper Aden, "The Case for Self-Implementing Site Remediation, Peck Property, Portsmouth, VA," presentation to EPA
20-Jan-05	Peck, B.D.	Webb, J.	Letter proposing that Peck amend its 22-Oct-04 self-implementing cleanup plan to include certain conditions and sampling plans
26-Jan-05	Welsh, D.S.	Werner, S.G.	Letter addressing conditions set out in EPA's 20-Jan-05 letter for self-implementing cleanup plan
01-Feb-05	Peck, B.D.	Webb, J.	Letter approving 22-Oct-04 self-implementing cleanup, subject to conditions set out in EPA's 20-Jan-05 letter
23-Feb-05	Ward, K.	Bernard, J.F.	Email colloquy regarding EPA approval of project; inquiry regarding interest rate for Peck's loan
28-Jun-05	Webb, J.N.	Peck, B.D.	Letter notifying EPA, et al. that Peck is going to stop conducting the PCB cleanup plan
15-Oct-05	Peck, B.D.	Burke, J.J.	EPA's response to Peck's Revised Notification and Certification, dated 13-Jul-04

Mr. Randy Sturgeon  
May 10, 2006  
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Date	Recipient	Sender	Description
07-Dec-05	Sturgeon, R., EPA	Peck, B.D.	Memorandum setting out reasons for withdrawing self-implementing cleanup plan, conclusions of risk assessment, and proposed "closure" plan
08-Dec-05	Peck, B.D. & Gant, Rene	Sturgeon, R.	Response to Peck's Dec-05 letter

8. *Provide information regarding modifications made to the property, including, but not limited to, areas of fill, areas where the topography was modified, areas of burial and/or dumping, and areas of construction and/or demolition.*

**RESPONSE:**

Peck demolished a building at the entrance to the property at 3500 Elm Avenue in response to a demand by the N&P Beltline. In addition, part of the former Proctor & Gamble masonry building near that entrance was demolished within the last ten years.

Inert material was dumped on the site by various contractors during the past ten years. If trash or suspect material was found, contractors were employed to remove the material for disposal at a landfill. Able Body Demolition spread inert concrete, asphalt, and soil on the property during the past few months. Any suspect soil or other material was to be placed in the area of the buildings where scrap metal processing operations once occurred.

Please also see the response to question 3 above.

9. *Provide all information on the current and recent use of the Site including actions such as, but not limited to, the storage of soils, material or equipment, or modification or movement of soils or sediments located on the Site.*

**RESPONSE:**

Please see the answer to question 8 above. In addition, during 2005, Able Body Demolition excavated certain areas of soil, moved the materials to the former operations area, and subsequently covered the area with inert materials. Able Body personnel were warned of the

# HUNTON & WILLIAMS

Mr. Randy Sturgeon  
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nature and potential danger of the excavated soil and were instructed about where on the property the soil should be placed.

10. *Provide the names, titles, areas of responsibility, addresses and telephone numbers of all persons that worked at the Site for longer than three years.*

RESPONSE:

Stanley Peck and Aaron Peck worked at the property for a period of time until the early 1990s. Their current addresses and phone numbers are:

Stanley J. Peck

[REDACTED]  
[REDACTED]  
[REDACTED]

Aaron M. Peck

[REDACTED]  
[REDACTED]  
[REDACTED]

Personnel records from the period of active site operations were not retained.

11. *If you have any information about other persons/entities who may have information which may assist the Agency in its investigation of the Site or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the person's entity's name, address, type of business, and the reason(s) why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.*

RESPONSE:

Peck has no additional information responsive to this question.





Mr. Randy Sturgeon  
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Please contact Roger Hatcher or me if you have questions about this response to the Information Request.

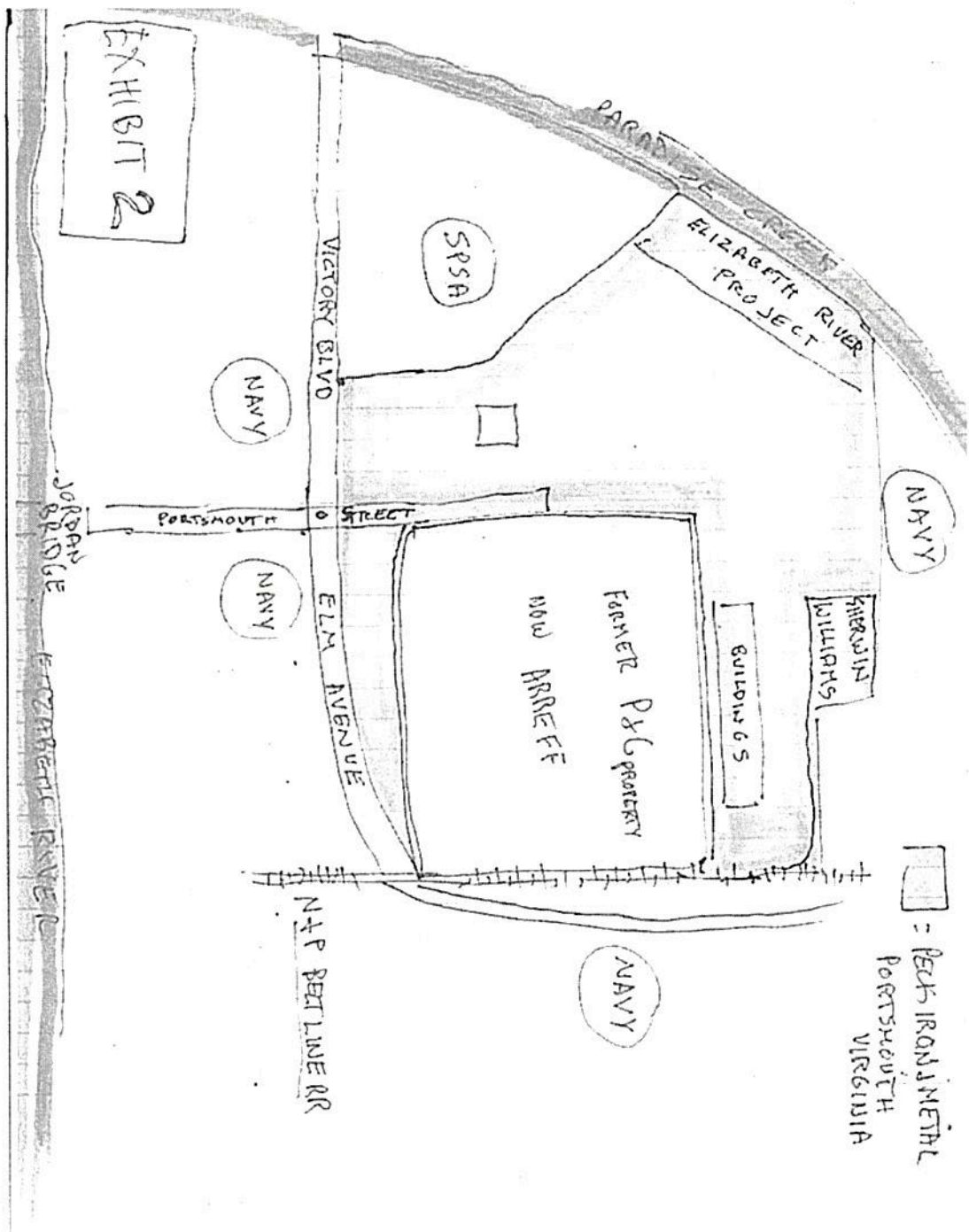
Yours truly,

A handwritten signature in cursive script that reads "Dan J. Jordanger".

Dan J. Jordanger  
Counsel to The Peck Company

Enclosures

cc: Mr. B. David Peck  
Roger F. Hatcher, Ph.D.





## Draper Aden Associates

Engineering • Surveying • Environmental Services

8090 Villa Park Drive  
Richmond, Virginia 23228  
(804) 264-2228 • Fax: (804) 264-8773  
daa@daa.com • www.daa.com

May 11, 2004

Mr. Donald S. Welsh  
Regional Administrator  
U.S. EPA -- Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

**RE:** Self-Implementing PCB Cleanup Plan  
34-Acre Site, Elm Avenue  
Portsmouth, Virginia  
DAA Project # R03186-01

Dear Mr. Welsh:

This Self-Implementing PCB Cleanup Plan is submitted on behalf of The Peck Company, Richmond, Virginia for the above referenced property. This property has been in the Virginia Department of Environmental Quality's Voluntary Remediation Program for more than a year and we are anxious to return this inactive property to productive use. The remaining issue that has stopped progress on this project concerns PCBs and thus, the reason for submitting the attached Plan.

The site meets all of the criteria for the self-implementing procedures and we believe that the Plan addresses all of the requirements of 40 CFR § 761.61. Prior to reviewing the plan, it is important that EPA understand the history of this property, which is summarized below by the owner, The Peck Company.

*Peck Recycling Co., Inc. bought, sold, and processed metal scrap for fifty years from different locations. The metal came from industrial plants, farms, auto parts yards, Federal Government (e.g. military bases); State (e.g. Highway Dept.) and Local (e.g. Police Dept.) agencies.*

*The metal scrap was purchased after several careful inspections. Trained inspectors looked at the material at the sellers' operation, upon arrival, when weighed, when unloaded, when processed, when stored, and when shipped. Upon being unloaded it was visually, if not manually separated into more than 40 different categories.*



Mr. Donald Welsh  
U.S EPA - Region III  
May 11, 2004  
Page 2

*The material was checked for radioactivity. Rejections were immediate if any hazardous or toxic material or substance were suspected. For example, 150,000 lbs. of material from a military base were rejected when the base could not definitely identify the liquid in the containers; DuPont had to take back 55-gallon drums when Peck was not satisfied with the stenciled markings on the containers; a railroad tank car from Allied Chemical was not accepted when Peck inspectors detected a noxious odor; Philip Morris (e.g. engines with lubricant drippings) material rejected; etc.*

*Transformers were not accepted from any sellers with the sole exception of a company that processed them. It removed the laminated steel, wires, copper and oil; then it triple rinsed them before delivery.*

*The Peck Recycling Company's primary concerns were its employees, its customers (the buyers), and its facilities and grounds. Its record is plain to see. None of its hundreds of employees ever reported or complained of handling or being affected by any hazardous or toxic material. Not one of the thousands of consumers ever reported or complained about discovering any substance that might be hazardous or toxic. Every buyer was very carefully looking for PCB, benzene, heavy metals, hydrocarbons, asbestos, and any attachments or substances that might cause problems.*

*The continuous training of all Peck employees as inspectors and material handlers had clear results. Peck regularly received a rebate of 25% from its insurance carrier for its extraordinary safety record and procedures. Note that every month Peck handled (i.e. received, unloaded, processed, stored, shipped) more than 100 million pounds of metals.*

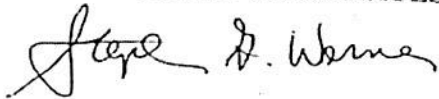
*It is also noteworthy that Peck's operations were in five different cities covering more than 120 acres (Eastern Shore, Danville, Woodford, Portsmouth, Richmond). Upon the sale of the Peck operations in 1997, the properties were closely examined. More than \$100,000 was spent in Phase II activities by independent environmental groups. The only PCB discoveries were on less than 1% of the property although 95% of the properties were used in operations. And the 1% area was where material from military bases was processed until 1969.*

The property owner, The Peck Company, and the prospective purchaser/developer, Pull-A-Part, Inc. have responded to all of the EPA and DEQ requests and unfortunately, feel that progress has again been delayed. EPA's prompt review and approval of this Plan is greatly appreciated.

Mr. Donald Welsh  
U.S EPA - Region III  
May 11, 2004  
Page 3

Any questions concerning this closure plan should be directed to either Dr. Roger F. Hatcher (804-492-9458) or me (804-261-2937).

Sincerely,  
**DRAPER ADEN ASSOCIATES**

A handwritten signature in black ink, appearing to read "Stephen G. Werner".

Stephen G. Werner, P.G.  
Director of Environmental Services

Attachment (2)

cc: Dr. Roger F. Hatcher  
B. David Peck  
James Bernard, DEQ  
Steven L. Levetan, Pull-A-Part, Inc.

**INTERVIEW SUMMARY**  
**Task Order 0001 Site 004**  
***Peck Iron and Metal Site***

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(b) (6)

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Prepared for:

**U.S. Environmental Protection Agency**  
**Region 3**  
Enforcement Support Services  
Hazardous Site Cleanup Division  
1650 Arch Street  
Philadelphia, PA 19103

---

Prepared by:

Chenega Global Services, LLC  
726 East 9<sup>th</sup> Avenue  
Anchorage, AK 99501

Work Assignment Number:  
Date Submitted:  
Contract Number:  
EPA Work Assignment Manager:  
Telephone Number:  
Chenega Project Manager:  
Telephone Number:  
Interviewer:

Task Order 0001 Site 004  
September 28, 2009  
EP-S3-09-02  
Joan Martin-Banks  
(215) 814-3156

(b) (4)



(b) (6)

**Name:**

(b) (6)

**Affiliation:**

Former Employee/Peck Iron and Metal Company

**Telephone:**

(b) (6)

**Type of Interview:**

In-Person

**Date of Interview:**

September 22, 2009

On September 22, 2009 the WITNESS was interviewed at his residence by (b) (4) (b) (4) Senior Investigator, of (b) (4) (b) (4). The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 004 the Peck Iron and Metal Site, Portsmouth, VA (the "Site"). The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape recorded. This interview was a follow-up interview from the interview conducted on March, 28, 2009.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS reiterated a review of his employment history with Peck Iron & Metal (PIM) that he had provided during the previous interview.

Because his position with PIM as the scale operator is crucial to identifying the non-bid scrap purchased by PIM, this interview concentrated on the WITNESS' observations while operating the scale.

The WITNESS reiterated that he was the scale operator at PIM (b) (6)

The WITNESS stated that only non-bid scrap purchased by PIM was weighed and identified at the scale. The WITNESS further explained that scrap metal that had been bid by PIM was transported to the yard by rail and truck. The WITNESS stated that he did not inspect this scrap.

When asked to identify the companies whose scrap was bid on by PIM and transported to the Portsmouth yard, the WITNESS was initially reluctant to answer because he had no first-hand involvement with the bid scrap. The WITNESS then stated that he recalls the following companies whose scrap was purchased by PIM:

**(b) (6)**

- Norfolk Shipbuilding and Dry Dock, Norfolk, VA: The WITNESS stated that he recalls PIM purchasing scrap metal from this Company on a bid basis. The WITNESS stated that he does not recall or does not know the types of scrap that PIM purchased from this company.
- CSX Transportation Co., Charlotte, NC: The WITNESS stated that he recalls PIM purchasing scrap metal from this company. The WITNESS stated that he does not know what type of scrap came into the Portsmouth yard from this company.

The WITNESS reiterated that when scrap came into the PIM yard through the scale, it was his responsibility to inspect the load and identify the type of scrap metal in each load. The WITNESS stated that he did not inspect the bulk loads purchased by PIM on a bid basis.

The WITNESS was asked if he ever observed gaskets in the scrap loads he inspected. The WITNESS stated no.

The WITNESS was asked if he ever observed transformers or capacitors in the loads purchased by PIM. The WITNESS stated that he never observed these items. The WITNESS explained that if transformers and capacitors were purchased by PIM, these items would have been in the bulk scrap that had been bid.

The WITNESS was asked if he had ever observed batteries in the scrap metal purchased by PIM. The WITNESS stated that he cannot recall.

The WITNESS reiterated that he has no knowledge of the types of scrap that was bid on by PIM. The WITNESS stated that Stanley Peck would have knowledge about this type of scrap metal.

The WITNESS was asked if he had recalled any additional companies since our interview on March 28, 2009 whose waste or scrap was sold to PIM or disposed at the PIM facility in Portsmouth, VA.

**ABB National Industries, Hampton, VA: Cannot recall.**

**Alcoa (Reynolds): Identified in previous interview.**

**American Gem Corporation, Chesapeake, VA: Cannot recall.**

**Anheuser-Busch, Inc., Williamsburg, VA: Cannot recall.**

**Argent Marine, Solomons, MD: Cannot recall.**

**Associated Naval Architects, Inc., Portsmouth, VA: Cannot recall.**

**CSX Transportation Co., Charlotte, NC: See comments above.**

**Electric Motor and Contracting Co., Chesapeake, VA: Cannot recall.**

**Ford Motor Company, Norfolk, VA: identified in previous interview.**

**General Electric Company, Richmond, VA: Cannot recall.**

**General Foam Plastics Corp., Norfolk, VA: Cannot recall.**

**General Motors Corporation: Cannot recall.**

**Gwaltney Company, Portsmouth, VA: Cannot recall.**

**Newport News Shipbuilding and Dry Dock Co.: Identified in previous interview.**



Norfolk Shipbuilding and Dry Dock, Co., Norfolk, VA: See comments above.  
Overhead Door Company, Virginia Beach, VA: Cannot recall.  
Phillip Morris, Inc., Richmond, VA: Cannot recall.  
Plasser America, Chesapeake, VA: Cannot recall.  
Potomac Electric Power Co., Washington, D.C.: Cannot recall.  
Power Mechanical, Inc., Hampton, VA: Cannot recall.  
Southeastern Public Service Authority, Chesapeake, VA: See comments above.  
Sumitomo Machinery Corp., Chesapeake, VA: Cannot recall.  
U. S. Navy, Norfolk, VA: Identified in previous interview.  
AMF Bowling, Richmond, VA: Cannot recall.  
Alcatel-Lucent, Murray Hill, NJ: Cannot recall.  
Brenco, Petersburg, VA: Cannot recall.  
Carolina Steel Corporation, Greensboro, NC: Cannot recall.  
Chesapeake Corporation, Richmond, VA: Cannot recall.  
Dean Foods, Dallas, Texas: Cannot recall.  
E.I. DuPont de Nemours and Company, Inc., Wilmington, DE: Cannot recall.  
Federal-Mogul Corporation, Southfield, MI: Cannot recall.  
GATX Corporation, Chicago, IL: Cannot recall.  
The Hon Company, Muscatines, IA: Cannot recall.  
IGM USA Inc., Charlotte, NC: Cannot recall.  
Kraft Foods, Northfield, IL: Cannot recall.  
Norfolk Southern Corporation, Norfolk, VA: Cannot recall.  
Pizzagalli Construction Company, Garner, NC: Cannot recall.  
Schlumberger Industries, Houston, TX: Cannot recall.  
Seaboard Marine, Miami, FL: Cannot recall.  
Stanley Hardware, New Britain, CT: Cannot recall.  
Super Radiator Coils, Richmond, VA: Cannot recall.  
Waste Management (Chambers Waste Systems of Virginia): Cannot recall.  
Windor Supply & Mfg., Inc., Tulsa, OK: Cannot recall.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on \_\_\_\_\_  
(Date)

Signed \_\_\_\_\_  
(Name)



(b) (6)

**Interviewer's Comments and Suggested Follow-up Interviews**

Interviewer Comments: (b) (6)

(b) (6)

The WITNESS stated that he would sign a copy of this interview summary.

When asked if he wanted his name kept confidential to the extent possible, the WITNESS stated yes.

Suggested follow-up Interviews:

- Stanley Peck

**INTERVIEW SUMMARY**  
**Task Order 0001 Site 24**  
***Peck Iron and Metal Site***

---

**Billy Boggs**

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Prepared for:

**U.S. Environmental Protection Agency**  
**Region 3**  
Enforcement Support Services  
Hazardous Site Cleanup Division  
1650 Arch Street  
Philadelphia, PA 19103

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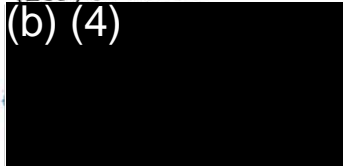
Prepared by:

**Chenega Global Services, LLC**  
726 east 9<sup>th</sup> Street  
Anchorage AK 99501

Work Assignment Number:  
Date Submitted:  
Contract Number:  
EPA Work Assignment Manager:  
Telephone Number:  
Chenega Project Manager:  
Telephone Number:  
Interviewer:

Task Order 0001 Site 24  
September 29, 2010  
EP-S3-09-02  
Joan Martin-Banks  
(215) 814-3156

(b) (4)

A large black rectangular redaction box covers the bottom right portion of the page, obscuring the contact information for the interviewee.

**Name:** Billy Boggs ("WITNESS")  
(b) (6)

**Affiliation:** Area Resident and former employee at the Portsmouth Naval Ship Yard

**Telephone:** (b) (6)

**Type of Interview:** In-Person

**Date of Interview:** September 23, 2010

On September 23, 2010 the WITNESS was interviewed at her residence by (b) (4) (b) (4) Senior Investigator, of (b) (4) (b) (4). The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24 the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape-recorded. During the course of this interview the WITNESS and Interviewer drove to the corner of Victory Blvd. and Elm Street (The entrance to Peck Iron and Metal) and observed the Site from the public street.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for area residents.

The WITNESS was asked to explain any association he had with Peck Iron and Metal Site located in Portsmouth, VA ("PIM").

The WITNESS stated that he has lived at his current address since 1941. The WITNESS stated that PIM is located approximately four miles from his residence and that he played on the Site many times. The WITNESS stated that he worked at the Navy Ship Yard ("NSY") in Portsmouth from 1960 to 2000 and that the entrance to the NSY is located directly across the street from the entrance to PIM. The WITNESS stated that he drove by the entrance to the PIM every morning and evening he went to work. This gave the WITNESS many years of observations of activities at PIM. The WITNESS stated that he was employed as a machinist during the time he was employed at NSY.

The WITNESS indicated that as a child growing up he and many of his friends played on PIM. The WITNESS stated that he recalls observing ammunition on the PIM property. The WITNESS stated that he specifically recalls picking up a hand grenade on the PIM. The WITNESS stated that this hand grenade still had the pin intact. The WITNESS stated that he threw the hand grenade in a wooded area. The WITNESS stated that he had observed numerous ammunition shells of all sizes with intact projectiles through out the PIM.

When asked to describe his general observations at PIM the WITNESS provided the following.

The WITNESS stated that he recalls that in the approximately 1960s to 1970s Proctor and Gamble ("P&G") had a plant on the PIM property. The WITNESS stated that he had observed a pipe coming out of the main P&G building. The WITNESS stated that this pipe ended at Paradise Creek and that the pipe dumped a white lard type substance into the Creek. The WITNESS stated that this pipe leaked and puddles of the lard substance were seen at many places along the pipe line on PIM.

The WITNESS pointed out a green cement building located on PIM and stated that he had observed numerous 55-gallon steel drums stored in this building. When asked if he recalled any markings or names on these drums the WITNESS provided the following.

The WITNESS stated that he observed drums with the name Sunoco stenciled on the side; The WITNESS stated that he also observed many red and blue drums stored in this building however

When asked the names of the companies who sold scrap metal to the PIM at Portsmouth, or the names of companies that the WITNESS had observed entering the PIM, the WITNESS provided the following.

- General Motors: The WITNESS stated that General Motors stored packaged marine diesel motors at PIM. The WITNESS stated that these motors were used for Navy landing craft. The WITNESS stated that when the Navy shipyard ordered a number of these motors, Peck was responsible to unpack and clean the motors. The WITNESS stated that this packaging included paraffin, oil and an unknown oily substance.
- Alcoa: The WITNESS stated that he had observed Alcoa Aluminum trucks enter PIM containing aluminum and that he observed aluminum on the PIM property.
- EMC Electric Motor and Contracting Company: The WITNESS stated that motors from EMC on PIM.
- General Electric Company: The WITNESS stated that he observed General Electric enter the PIM with open top containers containing boxes of motors. The WITNESS was unable to
- Newport News Shipbuilding and Dry Dock Company ("NNSC"): The WITNESS stated that he had observed NNSC drop off hydraulics systems and catapults at PIM.
- Norfolk Ship Yard: The WITNESS stated that the Norfolk Ship Yard overhauled Navy ships and that Peck received scrap metal from these overhauls.
- VEPCO: The WITNESS stated that he observed VEPCO enter PIM with flat bed trucks and that he had observed transformers on these trucks.



- CSX Transportation: The WITNESS stated that CSX entered the PIM Site on a railroad track spur and that CSX operated both flat bed cars and gondola cars on this spur to enter PIM. When asked the WITNESS stated that he recalls observing electrical transformers on the flat bed cars. The WITNESS stated that he had no information about where these transformers originated.
- Southeastern Public Service Authority ("SPSA"): The WITNESS stated that the property that SPSA is now located was part of the PIM property and was used as part of the PIM operation.

The WITNESS was asked if he had any knowledge of the following companies waste or scrap being sold to PIM or disposed at the PIM facility in Portsmouth, VA. The WITNESS stated that he cannot recall the types of scrap that was purchased by PIM. The WITNESS provided the following information.

**ABB National Industries, Hampton, VA: Could not recall.**  
**Alcoa (Reynolds): See comments above.**  
**American Gem Corporation, Chesapeake, VA: Could not recall.**  
**Anheuser-Busch, Inc., Williamsburg, VA: Could not recall.**  
**Argent Marine, Solomons, MD: Could not recall.**  
**Associated Naval Architects, Inc, Portsmouth, VA: Could not recall.**  
**CSX Transportation CO, Charlotte, NC: See comments above**  
**Electric Motor and Contracting Co., Chesapeake, VA: See comments above.**  
**Ford Motor Company, Norfolk, VA: Could not recall**  
**General Electric Company, Richmond, VA: See comments above.**  
**General Foam Plastics Corp., Norfolk, VA:**  
**General Motors Corporation: See comments above.**  
**Gwaltney Company, Portsmouth, VA: Could not recall.**  
**Newport News Shipbuilding and Dry Dock Co., Newport News, VA: See comments above.**  
**Norfolk Shipbuilding and Dry Dock, Co., Norfolk, VA: See comments above.**  
**Overhead Door Company, Virginia Beach, VA: Could not recall.**  
**Phillip Morris, Inc., Richmond, VA: Could not recall.**  
**Plasser America, Chesapeake, VA: Could not recall.**  
**Potomac Electric Power Co., Washington, D.C.: Could not recall.**  
**Power Mechanical, Inc., Hampton, VA: Could not recall**  
**Southeastern Public Service authority ("SPSA"), Chesapeake, VA: See comments above.**  
**Sumitomo Machinery Corp., Chesapeake, VA ("SMC"): Could not recall.**  
**U. S. Navy, Norfolk, VA: See comments above.**  
**AMF Bowling: Richmond, VA: Could not recall.**  
**Alcatel-Lucent, Murry Hill, NJ: Could not recall.**  
**Brenco, Petersburg, VA: Could not recall.**  
**Carolina Steel Corporation, Greensboro, NC: Could not recall.**  
**Chesapeake, Corporation, Richmond, VA: Could not recall.**

**Dean Foods, Dallas Texas: Could not recall.**  
**E.I. DuPont de Nemours and Company, Wilmington, DE: Could not recall.**  
**Federal-Mogul Corporation, Southfield, MI: Could not recall.**  
**GATX Corporation, Chicago, IL: Could not recall.**  
**The Hon Company, Muscatines, IA:**  
**IGM USA Inc., Charlotte, NC: Could not recall.**  
**Kraft Foods, Northfield, IL: Could not recall.**  
**Norfolk Southern corporation, Norfolk, VA: Could not recall.**  
**Pizzagalli Construction Company, Garner, NC: Could not recall.**  
**Schlumberger Industries, Houston, TX: Could not recall.**  
**Seaboard Marine, Miami, FL: Could not recall.**  
**Stanley Hardware, New Britain, CT: Could not recall.**  
**Super Radiator Coils, Richmond, VA: Could not recall.**  
**Waste Management (Chambers Waste Systems of Virginia):**  
**Windor Supply & Mfg., Inc., Tulsa, OK: Could not recall.**  
**AT&T Micro-Electronics: Could not recall**  
**Ball Metal Container, Williamsburg VA: Could not recall**  
**Capitol City Iron Works: Could not recall**  
**Cleveland Wrecking: Could not recall**  
**Continental Can, Hopewell, VA: Could not recall**  
**Davis Boat Works: Could not recall**  
**General Electric, Portsmouth, VA: Could not recall**  
**Gray Metal: Could not recall**  
**Hoechst Celanese, Portsmouth, VA: Could not recall**  
**Keller Industries: Could not recall**  
**L.A. Gentry: Could not recall**  
**Moon Engineering: Could not recall**  
**Nassau Metals: Could not recall**  
**NAITO America: Could not recall**  
**Proctor and Gamble Company: See comments above.**  
**St. Laurent Paperboard Co. (Smurfit-Stone Container): Could not recall**  
**Tyson Foods: Could not recall**  
**Virginia Electric and Power Company (VEPCO): See comments above.**  
**Weidmuller (Mann Industries): Could not recall**  
**Woodington Electric, Virginia Beach/Norfolk, VA: Could not recall.**

When asked the names of other employees at PIM the WITNESS provided the following.

- John Meeks

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on \_\_\_\_\_  
(Date)

Signed \_\_\_\_\_  
(Name)

### **Interviewer's Comments and Suggested Follow-up Interviews**

Interviewer Comments: The WITNESS was cooperative and forthcoming.

The WITNESS stated that because of his interest and profession as a machinist he was very interested in the types of material that Peck dealt in. As such he was probably more observant of activities at PIM than most people.

The WITNESS stated that many other companies dealt with Peck at PIM. He indicated that he will probably recall more names and will contact me with any additional information.

The WITNESS stated that she would sign a copy of this interview summary.

When asked if he wanted his name kept confidential to the extent possible, the WITNESS stated that she does not care.

Suggested follow-up Interviews:

- John Meeks

**INTERVIEW SUMMARY**  
**Task Order 0001 Site 24**  
***Peck Iron and Metal Site***

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**William Brewster**

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Prepared for:

**U.S. Environmental Protection Agency**  
**Region 3**  
Enforcement Support Services  
Hazardous Site Cleanup Division  
1650 Arch Street  
Philadelphia, PA 19103

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Prepared by:

**Chenega Integrated Systems, LLC**  
5911 Kingstowne Village Parkway  
Suite 300  
Alexandria, VA 22315

Work Assignment Number:  
Date Submitted:  
Contract Number:  
EPA Work Assignment Manager:  
Telephone Number:  
Chenega Project Manager:  
Telephone Number:  
Interviewer:

Task Order 0001 Site 24  
April 28, 2009  
EP-S3-04-01  
Joan Martin-Banks  
(215) 814-3156

(b) (4)

*Redacted*



**Name:** William Brewster ("WITNESS")

**Affiliation:** Former Employee/Peck Iron and Metal Company

**Telephone:**

**Type of Interview:** In-Person

**Date of Interview:** April 27, 2009

On April 27, 2009 the WITNESS was interviewed at his place of employment XXXX Senior Investigator XXXX, of XXX. The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24 the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape-recorded. This interview was a follow-up interview conducted on March 17, 2009. Only new areas of questioning was covered during this interview. The Interviewee had also recalled additional information since the March 17, 2009 interview.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS reiterated that he was employed by Peck Iron and Metal ("PIM") from 1975 to 1998. The WITNESS stated that he was employed as the controller at the Portsmouth PIM Site.

The WITNESS was asked to review an additional list of companies and asked to identify any of these companies who sold scrap to PIM at the Portsmouth Site.

- U.S. Government: the WITNESS stated that in addition to the St. Julian's Creek Annex, PIM purchased scrap on a bid basis from Camp Allen, Cheatham Annex, Yorktown, Quantico, Ft. Meade, and the Philadelphia Navy Base. The WITNESS stated that he is unable to recall the specific types of scrap PIM purchased from each location.
- Anheuser Busch: the WITNESS recalled additional information relating to Anheuser Busch. The WITNESS stated that Busch transported scrap to both the Peck facility in Richmond and the Portsmouth location. The WITNESS stated that he recalls purchasing stainless steel beer kegs.
- Norfolk Shipbuilding and Dry Dock: the WITNESS recalls Norshipco as a steady customer. The WITNESS stated that PIM would contract with Norshipco on a yearly basis. PIM supplied Norshipco with 30 and 40 cubic yard containers and when the

containers were half full; PIM would pick up the full container and leave an empty container. The WITNESS stated that much of the scrap metal contained lead base paint. The WITNESS was unable to provide any additional information relating to the type of scrap purchased by PIM. The WITNESS stated that containers supplied by PIM at the Norshipco were weighed at the Norshipco Site and the PIM Site. The WITNESS stated that Norshipco would keep a copy of their weigh ticket.

- Sumitomo Machinery: The WITNESS recalled additional information relating to this Company. The WITNESS stated that Sumitomo would occasionally retool at their manufacturing plant. The WITNESS stated that PIM would purchase scrap from this retooling which would include electric motors. The WITNESS does not know if any scrap contained PCBs.
- Southeastern Public Service Authority ("SPSA"): the WITNESS stated that SPSA sold scrap metal that was brought to the Landfill. The WITNESS stated that individual employees of SPSA picked scrap metal from the landfill and sold this scrap to PIM. The WITNESS stated that SPSA also picked up washers, dryers and refrigerators from home owners and sold these items to PIM.

When asked if he had any knowledge of liquid waste, PCBs, grease, oil, Freon or asbestos that was sold to PIM, the WITNESS stated that he had no knowledge. The WITNESS stated that when containers were brought in by the PIM truck drivers, the contents were weighed at the scale house. The scale operator was supposed to inspect the contents of the container to verify the types of metal being sold to PIM. The WITNESS stated that the scale operator had a movable step ladder that was used to look inside the containers and trucks. The WITNESS stated that there was no way to see or inspect items that were not located on the top of the container.

The WITNESS further explained that if there was something that was obviously not permitted to be disposed of at PIM, the crane operator would be the only employee who could identify these items and notify the office. The WITNESS used as an example a full 55-gallon steel drum.

When asked to further explain the disposition of records generated at PIM, the WITNESS provided the following.

The WITNESS stated that PIM operated autonomously from the Richmond facility and that all records and paperwork was maintained at the Portsmouth facility.

The WITNESS explained that when David Peck became the sole owner of PIM in approximately 1993, the WITNESS stated that he was directed to call the Richmond facility with raw sale numbers at the end of each month. The WITNESS stated that PIM continued to maintain the records generated at PIM which included the weigh tickets and monthly recapitulation of the largest customers.

The WITNESS stated that he recalls the name of one crane operator and provided the following.

- XXXXXXXX.

The WITNESS stated that XXXXX was the yard supervisor and may have knowledge of additional yard employees at PIM.

The WITNESS had previously been shown an additional list of companies and the WITNESS had commented on the companies he had knowledge.

When asked the names of other employees at PIM, the WITNESS provided the following.

- XXXXXXX
- XXXXXXX

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on \_\_\_\_\_  
(Date)

Signed \_\_\_\_\_  
(Name)



### **Interviewer's Comments and Suggested Follow-up Interviews**

Interviewer Comments: The WITNESS was cooperative and forthcoming.

The WITNESS suggested that I interview crane operators and yard employees for more specific information relating to the types of scrap that was received at PIM.

The WITNESS stated that he would sign a copy of this interview summary.

When asked if he wanted his name kept confidential to the extent possible, the WITNESS stated that he does not care.

Suggested follow-up Interviews:



**Name:** William Brewster ("WITNESS")

(b) (6)

**Affiliation:** Former Employee/Peck Iron and Metal Company

**Telephone:**

(b) (6)

**Type of Interview:** In-Person

**Date of Interview:** March 17, 2009

On March 17, 2009 the WITNESS was interviewed at his place of employment by (b) (4) (b) (4) Senior Investigator, of (b) (4) (b) (4). The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001, Site 24 the Peck Iron and Metal Site, Portsmouth, VA (the "Site.") The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked, and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this matter and did not want an attorney present. No other persons were present and this interview was not tape-recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former employees.

The WITNESS was asked to explain any association he had with Peck Iron and Metal (PIM) Site located in Portsmouth, VA.

The WITNESS stated that he was employed by PIM from 1975 to January 1998. The WITNESS stated that Julius Peck had owned the PIM facility in Portsmouth since 1945. The WITNESS stated that in 1975 Julius Peck sold the PIM scrap yard to the following British scrap Company.

- Bird International.

The WITNESS stated that Bird International (Bird) operated the PIM scrap yard until 1979. The WITNESS stated that in 1979 Bird sold the PIM scrap yard back to Julius Peck.

When asked if he worked for Bird during the time period Bird operated the PIM scrap yard, the WITNESS stated no. The WITNESS further explained that from 1975 to 1979 the WITNESS worked for the Peck Equipment Company. The WITNESS stated that the Peck Equipment Company was located adjacent to the PIM scrap yard at the address of 3850 Elm Street. The WITNESS stated that the Peck Equipment Company occupied three large warehouses previously owned by Proctor and Gamble Company.

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When asked if the Peck Equipment Company rented the warehouses from Proctor and Gamble the WITNESS stated that Julius Peck may have rented the warehouses initially; however, the WITNESS stated that Julius Peck eventually purchased this property.

The WITNESS explained that Peck Equipment purchased surplus ship equipment such as turbines, engines and ship parts. The WITNESS stated that the U. S. Navy published monthly catalogs listing equipment needed. The WITNESS stated that Peck Equipment would sell the surplus equipment to the Navy.

The WITNESS explained that when Peck sold the PIM scrap yard to Bird, Peck was precluded by the contract with Bird from getting into the scrap business within a fifty mile radius of PIM. The WITNESS stated that Julius Peck started the Richmond scrap yard as a result.

The WITNESS explained that he was the controller/bookkeeper for PIM during the entire time he was employed by PIM. The WITNESS stated that he paid accounts billable and prepared bills for payment. The WITNESS stated that he was assisted by (b) (6)

The WITNESS was asked the names of the Companies who sold PIM scrap metal and disposed of the scrap at PIM the WITNESS provided the following.

- U.S. Government: The WITNESS stated that PIM's biggest customer was the Government, and more specifically the Navy. The WITNESS stated that PIM purchased scrap through auctions held at the St. Julian's Annex. The WITNESS stated that Scrap from military basis throughout the east coast was shipped to the St. Julian's Annex. The WITNESS stated that PIM also bid on bulk scrap through the Department of Defense Material Command. The WITNESS stated that the scrap consisted of iron, non-ferrous metals and steel.
- Oceana Naval Air Station: The WITNESS stated that PIM made "spot" purchases from Oceana. The scrap included pipes and steel.
- Newport News Shipbuilding and Dry Dock Company ("NNSC"): The WITNESS stated that NNSC was a large account and that PIM purchased heavy steel, plates from ships steel beams.
- AT&T Company: The WITNESS stated PIM purchased wire and cooper from AT&T.
- Verizon: The WITNESS stated that PIM purchased wire and cooper from Verizon.
- Norfolk-Portsmouth Beltline: The WITNESS stated that PIM purchased rail, spikes, bolts and switches from this Company.
- Proctor and Gamble: The WITNESS explained that prior to 1975 the P&G factory located adjacent to PIM was a soap factory. The WITNESS stated that in

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approximately 1975 the P&G plant was converted to a peanut producing factory. The WITNESS stated that P&G sold steel bins and old motors to PIM.

- Colonas Ship Yard: The WITNESS stated that PIM purchased aluminum, iron and light steel from Colonas.
- Virginia Power and Electric Company ("VEPCO"): The WITNESS stated that VEPCO was a steady customer at PIM, however he could not recall the types of waste.
- Anheuser Busch: The WITNESS stated that Anheuser Busch was a customer of PIM and the Peck facility in Richmond. The WITNESS could not recall the types of waste purchased from this Company.
- CSX Transportation, Inc.: The WITNESS stated that PIM purchased scrap from CSX on a regular basis however he was unable to recall the type of scrap.
- Gwaltney: The WITNESS stated that PIM purchased scrap from Gwaltney on a regular basis. The WITNESS described the waste as duck work, conveyer systems and condensers. When asked if the condensers contained Freon, the WITNESS stated that he does not know.
- Norfolk Shipbuilding & Dry Dock: The WITNESS stated that this Company was a regular customer at PIM. The WITNESS was unable to recall the types of scrap.
- Plasser American: The WITNESS stated that Plasser was a semi-regular customer at PIM. The WITNESS described the scrap as steel frames and beams.
- Sumitomo Machinery Corporation of America ("SMCA"): The WITNESS stated that SMCA was a regular customer at PIM. The WITNESS could not recall the types of Scrap.
- Woodington Electric: The WITNESS stated that Woodington was a regular customer and that PIM purchased wire from Woodington.

The WITNESS stated that PIM purchased scrap from many other companies however he was unable to recall any further names.

When asked if he was aware of the location of any records, the WITNESS stated yes and provided the following.

- The WITNESS stated that when he left employment with PIM in 1998, all of the records relating to PIM were located in the building at 3500 Elm Street. The WITNESS stated that these records included all books and ledgers covering the prior twenty years.

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When asked the name of the insurance company that carried PIM insurance, the WITNESS stated that PIM contracted with (b) (6) to handle all insurance matters.

The WITNESS was asked to explain the association of the following companies to the Peck family. The WITNESS provided the following.

- Peck Iron and Metal Company: The WITNESS stated that Peck Iron and Metal was used as a holding company as well as the name of the PIM location in Portsmouth.
- Peck-Portsmouth Recycling: The WITNESS stated that he was unfamiliar with this name.
- ELM Leasing Company: The WITNESS stated that ELM leasing company was the Peck Company that leased the warehouse next to 3500 Elm Street. The WITNESS stated that Peck leased this warehouse to numerous businesses for storage of equipment.
- JSP Land Company, Inc.: The WITNESS stated that JSP was organized so that Julius Peck could rent a portion of the property under JSP Land Company to PIM and receive the rent for his property.

When asked the names of other PIM employees, the WITNESS provided the following.

(b) (6) Scale operator  
(b) (6) Yard supervisor.  
(b) (6) Assistant bookkeeper.

The WITNESS stated that PIM employed more than fifty laborers and truck drivers. The WITNESS indicated that these employees were usually from the local area.

The WITNESS stated that the area known as Carddock was a local neighborhood and (b) (6)  
(b) (6)

The WITNESS was asked if he had any knowledge of the following companies waste or scrap being sold to PIM or disposed at the PIM facility in Portsmouth, VA. The WITNESS stated that he cannot recall the types of scrap that was purchased by PIM. The WITNESS provided the following information.

**ABB National Industries, Hampton, VA: Could not recall.**  
**Alcoa (Reynolds): Could not recall**  
**American Gem Corporation, Chesapeake, VA: Could not recall.**  
**Anheuser-Busch, Inc., Williamsburg, VA: See comments above.**  
**Argent Marine, Solomons, MD: Could not recall.**  
**Associated Naval Architects, Inc., Portsmouth, VA: Could not recall.**  
**CSX Transportation Co., Charlotte, NC: See comments above.**

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Electric Motor and Contracting Co., Chesapeake, VA: Could not recall  
Ford Motor Company, Norfolk, VA: Could not recall.  
General Electric Company, Richmond, VA: Could not recall.  
General Foam Plastics Corp., Norfolk, VA: Could not recall  
General Motors Corporation: Could not recall.  
Gwaltney Company, Portsmouth, VA: See comments above.  
Newport News Shipbuilding and Dry Dock Co., Newport News, VA: See comments above.  
Norfolk Shipbuilding and Dry Dock, Co., Norfolk, VA: See comments above.  
Overhead Door Company, Virginia Beach, VA: Could not recall.  
Phillip Morris, Inc., Richmond, VA: Could not recall.  
Plasser America, Chesapeake, VA: See comments above.  
Potomac Electric Power Co., Washington, D.C.: Could not recall.  
Power Mechanical, Inc., Hampton, VA: Could not recall.  
Southeastern Public Service Authority ("SPSA"), Chesapeake, VA: Could not recall  
Sumitomo Machinery Corp., Chesapeake, VA ("SMC"): See comments above.  
U. S. Navy, Norfolk, VA: See comments above.  
AMF Bowling: Richmond, VA: Could not recall.  
Alcatel-Lucent, Murry Hill, NJ: Could not recall.  
Brenco, Petersburg, VA: Could not recall.  
Carolina Steel Corporation, Greensboro, NC: Could not recall.  
Chesapeake, Corporation, Richmond, VA: Could not recall.  
Dean Foods, Dallas Texas: Could not recall.  
E.I. DuPont de Nemours and Company, Wilmington, DE: Could not recall.  
Federal-Mogul Corporation, Southfield, MI: Could not recall.  
GATX Corporation, Chicago, IL: Could not recall.  
The Hon Company, Muscatines, IA: See comments above.  
IGM USA Inc., Charlotte, NC: Could not recall.  
Kraft Foods, Northfield, IL: Could not recall.  
Norfolk Southern Corporation, Norfolk, VA: Could not recall.  
Pizzagalli Construction Company, Garner, NC: Could not recall.  
Schlumberger Industries, Houston, TX: Could not recall.  
Seaboard Marine, Miami, FL: Could not recall.  
Stanley Hardware, New Britain, CT: Could not recall.  
Super Radiator Coils, Richmond, VA: Could not recall.  
Waste Management (Chambers Waste Systems of Virginia): Could not recall.  
Windor Supply & Mfg., Inc., Tulsa, OK: Could not recall.  
AT&T Micro-Electronics: Could not recall  
Ball Metal Container, Williamsburg VA: Could not recall  
Capitol City Iron Works: Could not recall  
Cleveland Wrecking: Could not recall  
Continental Can, Hopewell, VA: Could not recall  
Davis Boat Works: Could not recall  
General Electric, Portsmouth, VA: Could not recall  
Gray Metal: Could not recall  
Hoechst Celanese, Portsmouth, VA: Could not recall.

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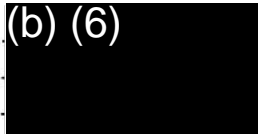
Keller Industries: Could not recall  
L.A. Gentry: Could not recall  
Moon Engineering: Could not recall  
Nassau Metals: Could not recall  
NAITO America: Could not recall  
Proctor and Gamble Company: See comments above  
St. Laurent Paperboard Co. (Smurfit-Stone Container): Could not recall  
Tyson Foods: Could not recall  
Virginia Electric and Power Company (VEPCO): See comments above.  
Weidmuller (Mann Industries): Could not recall  
Woodington Electric, Virginia Beach/Norfolk, VA: See comments above.

The WITNESS stated that he cannot recall the types of scrap associated with each of the above PIM customers.

When asked where the records were kept, the WITNESS stated that the reconciliation sheets were kept in a separate file from the weigh tickets. The WITNESS stated that while he was employed at PIM, his files were filed in a filing cabinet in his office.

When asked the names of other employees at PIM, the WITNESS provided the following.

(b) (6)

A black rectangular redaction box covering several lines of text.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on \_\_\_\_\_  
(Date)

Signed \_\_\_\_\_  
(Name)

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